

AMERICAN MUSHROOM INSTITUTE



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July 17, 2006

Standardization Section, Fresh Products Branch
Fruit and Vegetable Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Avenue, SW
Room 1661 South Building Stop 0240
Washington, DC 20250-0240

RE: Docket Number FV-06-307
Federal Register Vol. 71 No. 102, Friday, May 26, 2006 pp. 30366-30367
U.S. Standards for Grades of Mushrooms

To Whom It May Concern:

These comments are filed on behalf of the membership of the American Mushroom Institute (AMI), the national trade association which represents the domestic growers, buyer/shippers and processors of mushrooms and those who provide services to the mushroom industry.

AMI circulated the May 25, 2006 Federal Register notice to our membership and included a news article in our monthly magazine regarding the proposed revisions to the grade standards. This issue was also discussed at a Board of Directors meeting on June 13, 2006.

As a result of the opinions of our members who commented and the unanimous decision of the Board of Directors, AMI recommends no changes to the grade standards at this time. This is based on the practical reality that brokers, retailers and foodservice operators set the standards for mushrooms they wish to purchase. There is no consensus among growers, shippers or customers as to industry-wide standards for terms such as button, small, medium, large or jumbo. Each shipper wants to have maximum flexibility in working with their customer to provide the product they want.

There are several specific problems created by the proposal. Much of the generic promotional material used by the industry refers to all closed veil *Agaricus bisporus* species as "button mushrooms" regardless of their size. In addition, the term "open veiled" is problematic. The grade standards do not refer specifically to *Agaricus bisporus*, which is the common white or brown mushroom – also known as buttons, criminis, portabellas and a host of other names. There are a number of other varieties of mushrooms, such as shiitake (*Letinula edodes*), and oyster (*Pleurotus ostreatus*), which are open veiled mushrooms, for which the proposed grade standards would not be applicable.

We appreciate the attention given to this issue by USDA's Agricultural Marketing Service. Should the industry come to agreement on proposed changes to the grade standards, we will share these ideas with you.

Sincerely,

A handwritten signature in black ink that reads "Laura Phelps". The signature is written in a cursive, flowing style.

Laura Phelps
President